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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**In re:**

**FLEXIBLE FUNDING LTD. LIABILITY  
CO., et al.<sup>1</sup>**

Debtors.

§ **Chapter 11**  
§ **Case No. 21-42215-mxm**  
§ **(Jointly Administered)**  
§

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE**

**PLEASE TAKE NOTICE** that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned counsel hereby appears on behalf of Revolution Capital Inc. (the “Revolution Capital”), and request copies of all notices, pleadings, orders, and other documents brought before this Court with respect to the above-captioned proceedings, whether formal or informal, be served on the Revolution Capital by and through his counsel, as follows:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Flexible Funding Ltd. Liability Co. (4495) and Instapay Flexible, Inc. (7648).

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**PLEASE TAKE FURTHER NOTICE** that this request includes, without limitation (i) all notices and papers referred to in Bankruptcy Rules 2002, 3017, 9007, 9010 and 1109(b), (ii) all notices of hearings and entry of orders, (iii) every order signed in these cases, and (iv) every pleading or report filed in these cases, including, without limitation, schedules, statements of affairs, operating reports, motions, applications, complaints, demands, requests, petitions, plans of reorganization, disclosure statements, answering or reply papers, and memorandum briefs in support of any of the foregoing.

**PLEASE TAKE FURTHER NOTICE** that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of the Revolution Capital to (1) have final orders in non-core matters entered only after *de novo* review by a District Court judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: October 6, 2021

Respectfully submitted,

**PACHULSKI STANG ZIEHL & JONES, LLP**

/s/ Michael D. Warner

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*Counsel for Revolution Capital Inc.*

**CERTIFICATE OF SERVICE**

I certify that on October 6, 2021, a true and correct copy of the foregoing Notice of Appearance was served by this court's CM/ECF to all parties that are registered to receive such notice in the above cases.

/s/ Michael D. Warner

Michael D. Warner